

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION

UNITED STATES OF AMERICA ex rel.  
CORI RIGSBY and KERRI RIGSBY

RELATORS/COUNTER-DEFENDANTS

v.

CASE NO. 1:06cv433-LTS-RHW

STATE FARM MUTUAL INSURANCE COMPANY

DEFENDANT/COUNTER-PLAINTIFF

and

FORENSIC ANALYSIS ENGINEERING CORPORATION;  
EXPONENT, INC.; HAAG ENGINEERING CO.;  
JADE ENGINEERING; RIMKUS CONSULTING GROUP INC.;  
STRUCTURES GROUP; E.A. RENFROE, INC.;  
JANA RENFROE; GENE RENFROE; and  
ALEXIS KING

DEFENDANTS

**DEFENDANT/COUNTER-PLAINTIFF  
STATE FARM FIRE AND CASUALTY COMPANY'S  
COMBINED EXPERT DISCLOSURE**

Pursuant to Fed. R. Civ. P. 26(a)(2) and the Court's February 12, 2009 Order [261], Defendant/Counter-plaintiff State Farm Fire and Casualty Company, improperly denominated in the First Amended Complaint as "State Farm Mutual Insurance Company" ("State Farm"), submits this Combined Expert Disclosure.

State Farm anticipates calling the following expert witnesses:<sup>1</sup>

Kurtis R. Gurley, Ph.D.  
Dept. of Civil and Coastal Engineering  
University of Florida  
Post Office Box 116580  
Gainesville, FL 32611

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<sup>1</sup> As explained in "Defendant/Counter-Plaintiff State Farm Fire and Casualty Company's Combined Disclosure Regarding Mike Ferrier and Report of Mike Ferrier," State Farm reserves the right to offer fact, opinion, mixed fact and opinion, technical or other specialized testimony by Mr. Ferrier at the hearing set to begin on May 20, 2009. State Farm does not concede that any expert designation, report or disclosure is required for Mr. Ferrier's potential testimony, either under the Rules or any Order of this Court.

Dr. Gurley's report containing the information required by Fed. R. Civ. P. 26(a)(2) is attached hereto as collective Exhibit A and is incorporated herein.

Robert G. Dean, Sc.D.  
Dept. of Civil and Coastal Engineering  
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P.O. Box 116580  
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Dr. Dean's report containing the information required by Fed. R. Civ. P. 26(a)(2) is attached hereto as collective Exhibit B and is incorporated herein.

Mark Watson, P.E., SECB  
Jenkins Engineering, Inc.  
218 S. Thomas Street  
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Tupelo, Mississippi 38803

Mr. Watson's report containing the information required by Fed. R. Civ. P. 26(a)(2) is attached hereto as collective Exhibit C and is incorporated herein.

Gary Dailey  
Cornerstone Construction, Inc.  
1720 Woodside Cr.  
Tupelo, MS 38801

Mr. Dailey's report containing the information required by Fed. R. Civ. P. 26(a)(2) is attached hereto as collective Exhibit D and is incorporated herein.

State Farm reserves the right to call any expert witness listed, designated or called by any other Party.

This the 20<sup>th</sup> day of April, 2009.

Respectfully submitted,

STATE FARM FIRE AND CASUALTY COMPANY

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*PRO HAC VICE*

**CERTIFICATE OF SERVICE**

I, E. Barney Robinson III, one of the attorneys for State Farm Fire and Casualty Company, do hereby certify that I have this day caused a true and correct copy of the foregoing instrument to be delivered to the following, via the means directed by the Court's ECF System:

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This the 20<sup>th</sup> day of April, 2009.

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